



KERN COUNTY WASTE MANAGEMENT DEPARTMENT

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November 25, 2002

Goodyear K. Walker
California State Lands Commission
100 Howe Avenue, Suite 100 – South
Sacramento CA 95825

Dear Mr. Walker:

RE: EL Paso Line No. 1903 Pipeline Conversion Project
CSLC EIR No. 719
BLM Reference No. CACA – 42649
CSLC Files: WP6783; W30141
SCH # 2002101069
Sate and OIL Gas Lease PRC 7527.2 and 6783.1

The EL Paso Natural Gas Company is proposing to convert 303 miles of existing 30" pipe from crude oil transport to natural gas transport from Ehrenberg, Arizona to Emidio Station southwest of Bakersfield California. The pipeline is within a 100 foot wide easement known as the All-American pipeline. The project will involve pipeline reconstruction at approximately 40 locations in Kern County. Kern County Waste Management Department (WMD) has reviewed the EIR Notice of Intent for this project and has the following comments:

The pipeline's proposed alignment is about 660 feet north of the Boron Sanitary Landfill in Kern County, California. The landfill is located ½ mile south of the community of Boron, California. The landfill's specific location is the N ½ of the NW ¼ of the SW ¼ of the Section 5, T.10 N., R. 7 W.; SB&M. Vehicular access to the landfill is by way of Boron Avenue, a two-lane paved road. Boron Avenue crosses over a railroad track and is the only all-weather paved public road to the landfill. There are no known alternative easements (public or private) to serve the landfill. WMD is concerned that pipeline construction crossing the Boron Avenue Road at right angles will temporary prevent or hamper public vehicular access to the active landfill. Therefore, WMD recommends the following mitigation measures.

- The EIR should include mitigation to provide vehicular access to this landfill at all times.
- The EIR should specify measures which ensure public safety and minimize traffic disruptions on Boron Avenue.
- The contractor/engineer to submit design treatment information and operational details regarding the Boron Avenue/pipeline construction area to the Kern County Waste Management Department for review, only to assure public access to the landfill.
- The EIR should specify that utilities which serve the landfill (water, power poles, phone lines) shall not be disrupted, or damaged in anyway. There are other utilities along Boron Avenue where construction is proposed.

This comment is addressed in the *Impact Analysis and Mitigation* section of *Traffic and Transportation* (Section 4.8.4)

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Pipeline construction through road rights-of-way will either be bored or open trench cut. Both methods of construction may interrupt traffic, although boring will be less disruptive and is the preferred. An Encroachment Permit probably will be required from the Kern County Road Department.

In summary, WMD's requests that the EIR to be specific regarding the Boron Avenue crossing construction. State waste regulations require an all-weather paved public road to sanitary landfills. Since interruption of service is not an option, WMD would appreciate written notification three days in advance of pipeline construction near the Boron Sanitary Landfill. Current landfill days and hours of operation are as follows:

Sunday, Monday, Tuesday, Thursday	12:00 p.m. to 4:00 p.m.
Saturday	8:00 a.m. to 4:00 p.m.
Wednesday and Friday	Closed

Please note that there are other special communications utilities along Boron Avenue with links to Edwards Air Force Base.

WMD requested El Paso Gas Company and project representatives to provide aerial map figures of the proposed alignment. WMD made this request by phone call (Glen Rains to Goodyear K. Walker) and at the November 12 scoping meeting in Bakersfield. To date, WMD has not received the aerials map figures of the project pipeline alignment in Kern County. Therefore, we are not ready to comment on the project alignment remainder as it might affect other county landfills and county burn dumps.

If you have any questions please contact Nancy Ewert at (661) 862- 8953, or Donn Fergerson at (661) 862- 8765. Please send the aerial map figures to Glen Rains (661) 862- 8907 of this office.

Sincerely,
DAPHNE H WASHINGTON, DIRECTOR



By: Nancy L. Ewert, P.E
Technical Resource Manager

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CC: Tom Hurdman, Bureau of Land Management
Federal Energy Regulatory Commission, 888 First Street, NE, Room 1A, Washington D.C.
California State Lands Commission, 100 Howe Avenue, Suite 100 South, Sacramento, Ca.
El Paso Natural Gas Company 2 North Nevada Avenue, Colorado Springs, CO 80903
California Integrated Waste Management Board, 1901 "T" Street, P.O. Box 4025, Sacramento, Ca.
95812 - 4025
Edwards Air Force Base, AFMTC / XRX Bldg. 0001, Room 110 #1, South Rosamond Blvd. EAFB, Ca. 93524 - 1936
Kern County Road Department, 2700 "M" Street, Bakersfield, Ca. 93301
Kern County Planning Department, 2700 "M" Street, Bakersfield, Ca. 93301
WMD: Doug Landrum, Brian Khat, Joe Gillick
File: Boron Sanitary Landfill
Kern County Environmental Response Files

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OUR FILE NO.

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November 26, 2002

VIA TELECOPIER & U.S. MAIL

Goodyear K. Walker
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Re: CSLC EIR No. 719
BLM Serial No. CACA-42649
CSLC Files: WP6783;W30141
SCH# 2002101069
El Paso Line No. 1903 Pipeline Conversion Project

Dear Mr. Walker:

This firm represents Robert Schultz, Schultz Enterprises, Inc., the Robert and Martha Schultz Family Trust, and Jean Prel who own land through which the pipeline to be converted runs. They have received the Notice of Intent to Prepare a Joint Environmental Impact Report for the subject project.

Their primary concern is, of course, safety. A gas pipeline is an entirely different animal from an oil pipeline. The EIR should certainly contain appropriate safety measures to prevent damage to people, livestock and improvements on the land through which the pipeline runs. In addition, the project should be conditioned upon the pipeline owner's agreement to fully indemnify the adjacent owners from all such damage, and the pipeline owner's maintenance of appropriate insurance coverage to fulfill such indemnity.

The pipeline owner presently holds only an easement for oil pipeline purposes across our clients' land. Approval of the project should be conditioned upon the owner obtaining and paying just compensation for a gas pipeline easement. The subject pipeline also is close to improvements, including a water well. The subject project should be conditioned upon the pipeline owner's relocation of the pipeline to a further distance that is more safe.

Safety issues related to a natural gas pipeline are addressed in the *Impact Analysis and Mitigation Measures* section of *Hazards and Public Safety* (Section 4.6.4)

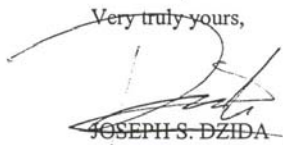
Issues related to easements for the Project need to be negotiated with EPNG.

Location of the water well is addressed in *Hydrology and Water Quality* (Section 4.5)

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Please call if you have any questions.

Very truly yours,



JOSEPH S. DZIDA
SULLIVAN, WORKMAN & DEE, LLP

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cc: Clients

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